

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,

Plaintiff/Counterclaim Defendant,

v.

ALCATEL USA,

Defendant/Counterclaim Plaintiff.

Civil Action No. 04-874-GMS

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TELCORDIA TECHNOLOGIES, INC.,

Plaintiff/Counterclaim Defendant,

v.

LUCENT TECHNOLOGIES INC.,

Defendant/Counterclaim Plaintiff.

Civil Action No. 04-875-GMS

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TELCORDIA TECHNOLOGIES, INC.,

Plaintiff/Counterclaim Defendant,

v.

CISCO SYSTEMS, INC.,

Defendant/Counterclaim Plaintiff.

Civil Action No. 04-876-GMS

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EXPERT REPORT OF VINCENT C. JONES, PE, Ph.D. Re: U.S. RE36,633

**CERTIFICATE OF SERVICE**

I, Adam W. Poff, Esquire hereby certify that on June 28, 2006, I caused the foregoing document to be served upon the following counsel of record as indicated below:

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# **EXHIBIT B**

Jones, Ph.D., Vincent C. CONFIDENTIAL  
Washington, DC

August 15, 2006

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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TELCORDIA TECHNOLOGIES, INC., : **CERTIFIED COPY**  
Plaintiff/ :  
Counterclaim Defendant, :  
vs. : Civil Action  
LUCENT TECHNOLOGIES INC., :  
Defendant/ : No. 04-875-GMS  
Counterclaim Plaintiff. :  
----- x  
TELCORDIA TECHNOLOGIES, INC., :  
Plaintiff/ :  
Counterclaim Defendant, :  
vs. : Civil Action  
CISCO SYSTEMS INC., : No. 04-876-GMS  
Defendant/ :  
Counterclaim Plaintiff. : CONFIDENTIAL  
----- x

Washington, D.C.

Tuesday, August 15, 2006

Videotaped Deposition of VINCENT C. JONES, PH.D.,

Henderson Legal Services, Inc.  
(202) 220-4158

Jones, Ph.D., Vincent C.    **CONFIDENTIAL**  
Washington, DC

August 15, 2006

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1    **human values.**

2            Q.    Dr. Jones, did you prepare an expert  
3    report in connection with this case?

4            A.    **Yes, I did.**

5            MR. ANZALONE: Let me ask the reporter to  
6    mark as Exhibit Jones 001 expert report of Vincent C.  
7    Jones.

8            (Exhibit Jones 001  
9            was marked for  
10    identification.)

11           BY MR. ANZALONE:

12           Q.    Is Exhibit Jones 001 your expert report,  
13    Dr. Jones, other than the large number of exhibits?

14           A.    **It would appear to be, yes.**

15           Q.    Who prepared Exhibit Jones 001?

16           A.    **Exhibit Jones 001 reflects my thoughts on**  
17    **the validity of the patent.**

18           Q.    Did you prepare it on behalf of Lucent and  
19    Cisco as well as Alcatel?

20           A.    **Yes.**

21           Q.    Who retained you in connection with this  
22    case?

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1                    MS. MEHTA: Object as to form.

2                    A.        I was retained initially by Alcatel and  
3 subsequently by Lucent and Cisco Systems.

4                    Q.        When were you retained by Alcatel?

5                    A.        I don't remember. Over a year ago.

6                    Q.        And when were you then retained by Lucent  
7 and Cisco?

8                    A.        Fairly recently, as we -- when it was  
9 determined that -- to do a joint report.

10                   Q.        Okay. How -- can you date when you were  
11 retained by Lucent and Cisco any more specifically  
12 considering this report was filed on the 28th of  
13 June 2006?

14                   MS. MEHTA: Object, vague.

15                   A.        Not -- not right now I couldn't. It was  
16 before we worked on the -- before I worked on the  
17 report with Cisco and Alcatel, or with Cisco and  
18 Lucent.

19                   Q.        Was it more than a month before you worked  
20 on the report?

21                   A.        I don't know. It was probably on the  
22 order of weeks to a month.

# **EXHIBIT C**

Jones, Ph.D., Vincent C. CONFIDENTIAL  
Washington, DC

August 15, 2006

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

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TELCORDIA TECHNOLOGIES, INC.,

**CERTIFIED COPY**

Plaintiff/

Counterclaim Defendant, :

vs.

: Civil Action

LUCENT TECHNOLOGIES INC.,

Defendant/

: No. 04-875-GMS

Counterclaim Plaintiff. :

----- x

TELCORDIA TECHNOLOGIES, INC.,

Plaintiff/

Counterclaim Defendant, :

vs.

: Civil Action

CISCO SYSTEMS INC.,

Defendant/

: No. 04-876-GMS

Counterclaim Plaintiff. : CONFIDENTIAL

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Washington, D.C.

Tuesday, August 15, 2006

Videotaped Deposition of VINCENT C. JONES, PH.D.,

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Washington, DC

August 15, 2006

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1     not trying -- this is not of any great moment.

2                MR. ANZALONE: No, I understand.

3                THE WITNESS: I do not believe I addressed  
4     it directly in the report.

5                BY MR. ANZALONE:

6                Q.     Now, are you aware that in response to  
7     your report, Telcordia filed an expert report by  
8     Dr. Clark?

9                A.     **Yes, I'm aware of that.**

10              Q.     Did you review the expert report of  
11     Dr. Clark in connection with this case?

12              A.     **Yes, I did.**

13              Q.     Did you review it on behalf of Lucent and  
14     Cisco?

15              MS. MEHTA: Objection, vague.

16              A.     **As far as I was concerned, everything I've**  
17     **been doing since then has been on behalf of all**  
18     **three.**

19              Q.     Do you understand that the parties had an  
20     opportunity to file reply reports in this case?

21              MR. CHERNY: Objection, vague.

22              A.     **I'm not -- reply reports to --**

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1 Q. Respond to the expert report of Dr. Clark.

2 A. I believe Dr. Clark did multiple expert  
3 reports. Which one are you referring to?

4 Q. I'm talking about the one -- his report in  
5 response to your invalidity and unenforceability  
6 report.

7 MS. MEHTA: I'm sorry, and the question is  
8 -- just -- we lost track of the question there.

9 BY MR. ANZALONE:

10 Q. Did you understand that the parties had an  
11 opportunity to file reply reports in this case.

12 MS. MEHTA: Objection, vague.

13 A. No.

14 Q. Were you asked to prepare a reply to the  
15 Dr. Clark report?

16 MS. MEHTA: I'm going to object to that to  
17 the extent that it seeks privileged information.

18 THE WITNESS: Can I answer it?

19 MS. MEHTA: If you had conversations with  
20 attorneys that were not the basis for a report that  
21 might be responsive to this, I'm going to instruct  
22 you not to answer the question with respect to those

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1        conversations.

2                    THE WITNESS: I haven't had conversations  
3        with anybody other than attorneys with regards to  
4        this case.

5                    BY MR. ANZALONE:

6            Q.        Do you have an -- you understand that you  
7        did not file a reply to Dr. Clark's report in this  
8        case.

9            A.        **That is correct.**

10          Q.        Do you know why? And just answer yes, no  
11        or I don't know.

12          A.        **Do I know why?**

13          Q.        Yes. Do you personally know why?

14          A.        **Do I personally know why I did not file a**  
15        **report in response.**

16          Q.        That's correct.

17          A.        **Yes, I know why.**

18          Q.        Okay. What is the reason you didn't file  
19        a reply report?

20                    MS. MEHTA: And I'm going to caution you  
21        here, if this was information that you learned from  
22        an attorney, you can't reveal that. If you have

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August 15, 2006

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1 some other information that was not learned from an  
2 attorney, then you can answer that question.

3 **A. I wasn't asked to generate a reply.**

4 Q. Okay. Were you asked to prepare a report  
5 on whether either Lucent products or Cisco products  
6 infringe any of the claims of the '633 patent?

7 **A. No.**

8 Q. Do you know why you were not asked?

9 MS. MEHTA: Same caution. If there's any  
10 information that you may have learned from a lawyer,  
11 don't disclose that. Otherwise you can answer.

12 **A. I have no idea.**

13 Q. How many times have you had an opportunity  
14 to read through Exhibit Jones 001, your expert  
15 report?

16 MS. MEHTA: Objection, vague.

17 **A. I'm not sure -- you know, when you say**  
18 **read through, do you mean just glance over it? Do**  
19 **you mean read it thoroughly?**

20 Q. Read it thoroughly.

21 MS. MEHTA: Still vague.

22 **A. As many as I wanted.**